



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CPK: BTR
F.#2018R01075

*610 Federal Plaza
Central Islip, New York 11722*

BY ECF AND HAND

May 30, 2019

The Honorable Joan M. Azrack
United States District Judge
United States District Court
Eastern District of New York
924 Federal Plaza
Central Islip, New York 11722-4454

Re: United States v. Abdulrahman Khwaja and Shikeba Khwaja,
Docket No. 8-CR-607(JMA)

Dear Judge Azrack:

The United States respectfully submits this letter opposing the defendants Abdulrahman Khwaja and Shikeba Rhamatzada's May 29, 2019 request for blanket authority to contact and associate with their charged co-conspirators and "immediate and

extended family who are employees of National Electronics." The Government opposes that application.

The defendants are charged with operating a sophisticated multimillion dollar trade-based money laundering operation moving the profits from criminal activity, including narcotics sales, through the United States to locations throughout the world, primarily South America. The government's evidence will show bulk cash deliveries, unreported by the defendants and testimony of undercover agents directed to transfer cash drug sale proceeds from drug dealers to the defendant's companies.

Abdulrahman Khwaja is one of the leaders of a trade-based money laundering scheme. Shikeba Rhamatzada, acted to maintain the books and records of the Khwaja's intertwined companies and directed how cash was or was not reported. She orchestrated the multiple unnecessary paper transfers in order to layer and hide the nature, source and ownership of the monies received in this operation.

The bail package obtained to secure the defendants appearance and deal with their danger to the community was litigated over a number of days. See: Dkt. 23 (Government's initial letter-motion seeking detention). The bail condition that the defendants not associate with co-conspirators and employees of the companies used to launder money was directly

related to minimize the continuing danger the defendants pose. While the Government, with the consultation of Pre-Trial Services, on a case by case basis, has liberally consented to modifications of the conditions of bail for Abdulrahman Khwaja and Shikeba Rhamatzada to attend family functions or funerals. In each instance, the contact with restricted persons was identified beforehand; the location was stated, as was the length of interaction, and the particular reason for the requested contact. The government and agents were in a position to analyze the circumstances and provide a considered opinion. The current request to remove all restrictions of contact between co-conspirators and company employees offers no such protections and therefore is inapropos. The application should be denied.

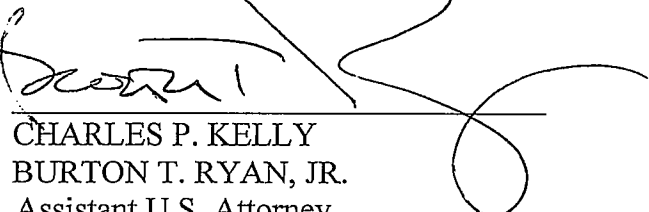
As to the request to spend the Eid al-Fitr religious festival the government joins Pre-Trial and objects. There is no necessity of the defendants voluntarily visiting co-conspirators or employees homes after their mosque religious services.

CONCLUSION

For the reasons set forth above, the defendants Abdulrahman Khwaja and Shikeba Khwaja's application to modify their bail conditions should be denied

RICHARD P. DONOGHUE
United States Attorney

By:


CHARLES P. KELLY
BURTON T. RYAN, JR.
Assistant U.S. Attorney

cc: Counsel for defendant Abdulrahman Khwaja and Shikeba Rhamatzada